

Remarks/Arguments

Claims 1-76 are pending in the present application. In the February 12, 2004 Office Action, claims 1-9, 11, 12, and 61-63 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,966,648 to Ortberg et al. (hereinafter, "Ortberg"). Claims 10, 29, 31-35, and 72 were rejected under 35 U.S.C. § 103(a) as being obvious in view of Ortberg. By this Amendment, claims 13-23 and 41-55 are canceled. Applicants respectfully request reconsideration of the present claims in view of the foregoing amendments and the following remarks.

I. Formal Matters:**Election/Restriction Requirement**

Previously presented claims 1-76 were subject to a restriction requirement. The Examiner proposed to separate claims 1-76 into two groups: Group I, Claims 1-12, 24-40, and 56-76, directed to an apparatus of a chassis for holding telecommunication cards and telecommunication modules; and Group II, Claims 13-23 and 41-55, directed to an apparatus of a telecommunication module.

During a telephone conversation with the Examiner and Steven Bruess on February 2, 2004, the applicants provisionally elected, without traverse, the claims of Group I, Claims 1-12, 24-40, and 56-76, directed to an apparatus of a chassis for holding telecommunication cards and telecommunication modules. The applicants hereby affirm the election of Group I, Claims 1-12, 24-40, and 56-76, directed to an apparatus of a chassis for holding telecommunication cards and telecommunication modules. Claims 13-23 and 41-55 have been cancelled.

Allowable Subject Matter

Applicants appreciate the indication by Examiner Doan in the February 12, 2004 Office Action that claims 24-28, 36-40, 56-60, and 64-71 are allowable over the art of record and that claims 30 and 73-76 contain allowable subject matter.

For at least the reasons given below, the applicants also respectfully submit that pending claims 1-12, 29-35, 61-63 and 72-76 are in condition for allowance.

Drawings

The drawings were objected to because of non-uniform numbers and letters in the figures. The applicants submit that formal drawings will be submitted prior to the close of prosecution.

II. Prior Art Rejections:

Independent Claim 1

Claim 1 was rejected under 35 U.S.C. §102(b) as being anticipated by Ortberg. The applicants have amended independent claim 1 to recite further features of the chassis. Ortberg does not teach, suggest, or describe each recitation of amended independent claim 1. In particular, Ortberg does not teach “the second horizontal surface having a first ridge and a second ridge positioned substantially parallel to but spaced from the first ridge, with a plurality of card slots extending across the first and second ridges of the second horizontal surface and substantially parallel to the plurality of card slots of the first horizontal surface” as recited by claim 1. As seen in figures 1 and 2 of Ortberg, Ortberg teaches a single ridge on the first and second horizontal surfaces. Because Ortberg does not teach a horizontal surface with a first and second ridge, independent claim 1 is allowable over Ortberg.

Dependent Claims 2 and 3

Because claims 2 and 3 further limit allowable independent claim 1, dependent claims 2 and 3 are allowable over Ortberg.

Dependent Claim 4

Claim 4 was rejected under 35 U.S.C. § 102(b) as being anticipated by Ortberg. The applicants submit that Ortberg fails to teach, suggest, or describe any recitation of dependent claim 4. In particular, Ortberg fails to teach or suggest “wherein the plurality of circuit cards have circuitry configured to convert electrical signals to optical signals and to convert optical signals to electrical signals.” The February 12, 2004 Office Action suggests that Ortberg teaches a plurality of modules having circuitry for converting electrical signals to optical or optical signals to electrical signals. The applicants

respectfully disagree. Ortberg provides for amplification of radio frequency signals passing through coax connectors. Ortberg does not teach conversion of electrical signals to optical signals or optical signals to electrical signals or the circuitry for these conversions. For at least this reason, and because claim 4 depends from allowable independent base claim 1, dependent claim 4 is allowable over Ortberg.

Dependent Claim 5

Claim 5 was rejected under 35 U.S.C. §102(b) as being anticipated by Ortberg. Ortberg does not teach, suggest, or describe each recitation of dependent claim 5. As discussed above with respect to independent claim 1, Ortberg does not teach a second ridge. Because Ortberg does not teach a second ridge, Ortberg does not teach “openings on the first and second ridge between adjacent card slots” as recited by claim 5. For at least this reason, and because claim 5 depends from allowable independent claim 1, dependent claim 5 is allowable over Ortberg.

Independent Claim 6

Claim 6 was rejected under 35 U.S.C. §102(b) as being anticipated by Ortberg. The applicants have amended independent claim 6 to recite further features of the chassis. The applicants respectfully submit that Ortberg does not teach, suggest, or describe each recitation of amended independent claim 6. In particular, Ortberg does not teach a divider slot “extending to an edge of the first portion, but not extending to the edge of the first horizontal surface” as recited by claim 6.

As shown in FIGS. 1 and 2 of Ortberg, Ortberg teaches a plurality of parallel card slots and a plurality of secondary holes between the card slots. Neither the card slots nor the secondary holes are equivalent to the divider slot recited by claim 6. The card slots taught by Ortberg extend through a ridge in a bottom horizontal surface and a corresponding plurality of parallel card slots extend through a recessed portion in a top horizontal surface. These card slots extend all of the way across the ridge and recessed area of horizontal bottom and top surfaces respectively. Thus, the card slots do not extend to one edge of the first portion, but *not* extend to the edge of the horizontal surface as recited by claim 6.

Additionally, the plurality of secondary holes taught by Ortberg are not equivalent to the divider slot recited by claim 6 since they do not “extend to one edge of the first portion” as recited by claim 6. Because the secondary holes taught by Ortberg do not extend to an edge of a first portion, and because the card slots taught by Ortberg extend to the edge of the first horizontal surface, Ortberg does not teach a structure that is equivalent to the recitations of independent claim 6. Accordingly, independent claim 6 is allowable over Ortberg.

Dependent Claims 7-11

Because claims 7-11 further limit allowable independent claim 6, dependent claims 7-11 are allowable over Ortberg.

Dependent Claim 12

Claim 12 was rejected under 35 U.S.C. § 102(b) as being anticipated by Ortberg. As discussed above with respect to dependent claim 4, Ortberg fails to teach, suggest, or describe “wherein the plurality of circuit cards have circuitry configured to convert electrical signals to optical signals and to convert optical signals to electrical signals.” The February 12, 2004 Office Action suggests that Ortberg teaches a plurality of modules having circuitry for converting electrical signals to optical or optical signals to electrical signals. The applicants disagree. Ortberg provides for amplification of radio frequency signals passing through coax connectors. Ortberg does not teach conversion of electrical signals to optical signals or optical signals to electrical signals or the circuitry for these conversions. For at least this reason, and because claim 12 depends from allowable independent base claim 6, dependent claim 12 is allowable over Ortberg.

Independent Claim 29

Claim 29 was rejected under 35 U.S.C. §103(a) as being obvious in view of Ortberg. Ortberg does not teach, suggest, or describe each recitation of independent claim 29. In particular, Ortberg does not teach “a first baffle surface disposed between the first and second vertical sidewalls, the first baffle surface being substantially perpendicular to the first and second vertical sidewalls and angled with respect to the first

and second horizontal surfaces” as recited by claim 29. The February 12, 2004 Office Action suggests that a baffle surface is considered to be obvious. The applicants respectfully disagree. If the Examiner is suggesting that the modification of a chassis with a baffle of the same structural configuration as that recited by claim 29 is so well-known within the art that Official Notice can be taken, the applicants respectfully traverse this assertion and request that the Examiner cite a reference in support of this position as required by MPEP §2144.03.

Even if it is obvious to take action to protect a device from heat damage, and the applicants are not suggesting that it is, virtually limitless structural configurations may be used to provide the desired heat protection. The structure of a baffle, i.e. material, size, placement, angles, components, etc., may be nonobvious over prior art, as is the baffle recited by claim 29. Ortberg does not teach using a baffle for heat protection. Consequently, Ortberg does not teach the specific structure of the baffle recited by claim 29. Accordingly, for at least the reasons that Ortberg does not teach a baffle, that there is nothing in the teaching of Ortberg to suggest that modifying a chassis with an angled baffle between and perpendicular to the sidewalls would be desirable, and that no references were cited as teaching the specific baffle structure recited by claim 29 to support an obviousness rejection, independent claim 29 is allowable over Ortberg.

Dependent Claims 31 and 32

Claims 31 and 32 were rejected under 35 U.S.C. §103(a) as being obvious in view of Ortberg. Ortberg does not teach, suggest, or describe any recitation of dependent claims 31 and 32. As discussed above with respect to independent claim 29, it would not be obvious for one skilled in the art at the time Ortberg was invented, to modify the chassis design to include baffles similarly configured to those recited by claims 29-32. To modify Ortberg with a first baffle made from solid material, a second baffle of mesh material disposed between and substantially perpendicular to the first and second vertical sidewalls, and angled with respect to the first and second horizontal surfaces and the first baffle surface, and with a third baffle of mesh material adjacent to the second baffle surface with a separation between the second and third baffle surfaces, is not obvious given the teachings of Ortberg, which do not include the use of *any* baffle. Again, the

applicants request that the Examiner cite a reference to support the position taken that modifying the chassis taught by Ortberg with the baffles recited by claims 31 and 32 would have been obvious by one of ordinary skill in the art. For at least these reasons and the reasons stated above with respect to independent claim 29, dependent claims 31 and 32 are allowable over Ortberg.

Dependent Claim 33

Claim 33 was rejected under 35 U.S.C. §103(a) as being obvious in view of Ortberg. Ortberg does not teach, suggest, or describe any recitation of dependent claim 33. Because Ortberg does not teach a first baffle surface, Ortberg does not teach “wherein a first baffle surface has a lip including a plurality of card slots” as recited by claim 33. The applicants submit that it would not be obvious to include the structure recited by claim 33 in the chassis taught by Ortberg. Even if the chassis taught by Ortberg was modified to include a baffle, the baffle would not necessarily require a lip including a plurality of card slots. This “lip including a plurality of card slots” as recited by claim 33 is necessary given the particular structure and operation of the present invention. For at least these reasons, and because claim 33 depends from allowable independent claim 29, dependent claim 33 is allowable over Ortberg.

Dependent Claim 34

Because Ortberg fails to teach, suggest, or describe the recitations of claim 34 and because claim 34 further limits allowable independent claim 29, dependent claim 34 is allowable over Ortberg.

Dependent Claim 35

Claim 35 was rejected under 35 U.S.C. § 103(a) as being obvious over Ortberg. The applicants submit that Ortberg fails to teach, suggest, or describe any recitation of dependent claim 35. In particular, Ortberg fails to teach or suggest “wherein the plurality of circuit cards have circuitry configured to convert electrical signals to optical signals and to convert optical signals to electrical signals.” The February 12, 2004 Office Action suggests that Ortberg teaches a plurality of modules having circuitry for converting

electrical signals to optical or optical signals to electrical signals. The applicants respectfully disagree. Ortberg provides for amplification of radio frequency signals passing through coax connectors. Ortberg does not teach conversion of electrical signals to optical signals or optical signals to electrical signals or the circuitry for these conversions. Further, there is no motivation to modify Ortberg with this circuitry as optical to electrical or electrical to optical conversion circuitry would not facilitate the amplification of radio frequency signals. For at least this reason, and because claim 35 depends from allowable independent base claim 29, dependent claim 35 is allowable over Ortberg.

Independent Claim 61

Claim 61 was rejected under 35 U.S.C. §102(b) as being anticipated by Ortberg. Ortberg does not teach, suggest, or describe each recitation of independent claim 61. In particular, Ortberg does not teach “the first horizontal surface having a second ridge positioned substantially parallel to but spaced from the first ridge,” “the first and second ridges having at least one opening between adjacent card slots,” and “the plurality of modules having circuitry for converting electrical signals to optical or optical signals to electrical signals, the circuitry including an optics transceiver positioned over the first ridge and a DC-DC converter positioned over the second ridge” as recited by claim 61.

As discussed above with respect to claim 1, Ortberg does not teach a second ridge. Consequently, Ortberg does not teach at least one opening between adjacent card slots on the second ridge. Additionally, as discussed above with respect to claims 4, 12, and 35, Ortberg does not teach circuitry for converting electrical signals to optical or optical signals to electrical signals. Consequently, Ortberg does not teach the specific circuitry recited by claim 61. Accordingly, for at least these reasons, independent claim 61 is allowable over Ortberg.

Dependent Claim 62

Claim 62 was rejected under 35 U.S.C. §102(b) as being anticipated by Ortberg. Ortberg does not teach, suggest, or describe each recitation of independent claim 62. In particular, Ortberg does not teach “a plurality of openings between the first and second

ridge, and wherein the plurality of modules further include a shielding cage enclosing at least a portion of the circuitry, the shielding cage being positioned between the first and second ridges” as recited by claim 62. As discussed above, since Ortberg does not teach a second ridge, Ortberg does not teach a plurality of openings between the first and second ridge. Additionally, Ortberg does not teach a shielding cage positioned between the first and second ridges. Further, Ortberg does not teach a shielding cage enclosing circuitry included with the plurality of modules. Ortberg teaches modules that contain a circuit card. As FIGS. 5 and 6 of Ortberg illustrate, no circuitry within a module is located within a shielding cage. For at least these reasons, and because claim 62 depends from allowable independent claim 61, dependent claim 62 is allowable over Ortberg.

Dependent Claim 63

Because Ortberg fails to teach, suggest, or describe the recitations of claim 63 and because claim 63 further limits allowable independent claim 61, dependent claim 63 is allowable over Ortberg.

Independent Claim 72

Claim 72 was rejected under 35 U.S.C. §103(a) as being obvious in view of Ortberg. Ortberg does not teach, suggest, or describe each recitation of independent claim 72. As discussed above with respect to independent claim 29, it would not be obvious to modify the teachings of Ortberg to include “a first baffle surface disposed between the first and second vertical walls, the baffle surface forming an angle relative to the horizontal surface” as recited by claim 72. Consequently, Ortberg cannot teach “one or more divider walls having a first edge parallel to the baffle surface” as recited by claim 72. The applicants again request that the Examiner provide an additional reference for the position taken that it would be obvious to modify the chassis taught by Ortberg with the baffle recited by claim 72.

Even if Ortberg were modified to include a baffle surface, it would not be obvious for one or more divider walls to have an edge parallel to the baffle surface. The design and configuration of the edges of the divider walls would not necessarily need to correspond to the design and configuration of the baffle surface, depending on the

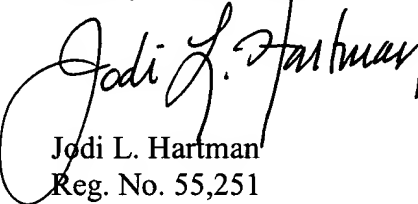
location of the baffle. For at least these reasons, independent claim 72 is allowable over Ortberg.

III. Conclusion

In view of the foregoing amendment and remarks, the applicants respectfully submit that the present application is in condition for allowance. Reconsideration and reexamination of the application and allowance of the claims at an early date is solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicants' undersigned attorney at the number below.

Respectfully submitted,

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